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BY ECF

The Honorable Richard M. Gergel
United States District Court
For the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: **Tyco Fire Products LP v. AIU Ins. Co., et al., No. 2:23-cv-02384 (D.S.C.)**

Dear Judge Gergel:

This letter is being submitted on behalf of Plaintiff Tyco Fire Products LP (“Tyco”) and the Defendant AIG Insurers.¹ As set forth below, Tyco and the AIG Insurers request that the Court enter the attached Proposed Order providing for a modest fourteen-day extension of the current expert report and responsive expert report deadlines, and a seven-day extension of the current deadline for conclusion of expert discovery, which will allow the parties to provide any relevant fact witness and 30(b)(6) deposition testimony to their experts in time to incorporate that testimony in their expert reports. The Proposed Order does not change any other dates, such that briefing on dispositive motions will remain scheduled for completion on June 1, 2024, as previously directed by the Court.

The parties to this action are currently working to complete fact witness and 30(b)(6) depositions pursuant to the Court’s October 30, 2023 Scheduling Order (Dkt. No. 111). That Scheduling Order directs the Parties to (a) exchange expert reports by March 8, 2024, (b) exchange responsive expert reports by March 25, 2024, and (c) complete all expert discovery by April 19, 2024 (*see* Dkt. No. 111 at ¶ 11). The AIG Insurers and Tyco agree that a modest extension of the foregoing expert deadlines is reasonable, and given the expedited schedule in this case, this short extension of interim deadlines relating solely to expert discovery will assist the parties’ efforts to present evidence to the Court on any summary judgment motions.

¹ AIU Insurance Company, American Home Assurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, Pa., and New Hampshire Insurance Company.

In light of the foregoing, Tyco and the AIG Insurers respectfully request that the Court enter the attached Proposed Order, which: (a) extends the deadline to produce expert reports two weeks, from March 8 to March 22, 2024; (b) extends the deadline to produce responsive expert reports two weeks, from March 25 to April 8, 2024; and (c) extends the deadline to complete expert discovery one week, from April 19 to April 26, 2024. The Proposed Order would not modify any other deadlines in the Scheduling Order, including the deadline to file or complete briefing of dispositive motions.

Tyco and the AIG Insurers appreciate the Court's attention to this matter and are available to discuss this issue further with the Court.

Respectfully submitted,

/s/ Adam J. Kaiser
Adam J. Kaiser

cc: All Counsel of Record (by ECF)